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10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13

14 ARJUN VASAN,

15 Plaintiff,

16 v.

17
18 CHECKMATE.COM, INC.,

19 Defendant.
20

21 CHECKMATE.COM, INC.,

22 Counterclaim-Plaintiff,

23 v.
24

25 ARJUN VASAN,

26 Counterclaim-
27 Defendant.
28

Case No. 2:25-CV-00765-MEMF-JPR

Magistrate Judge Jean P. Rosenbluth

**CHECKMATE.COM, INC.'S
RESPONSES TO PLAINTIFF
ARJUN VASAN'S SECOND SET
OF REQUESTS FOR
ADMISSIONS**

Complaint Filed: January 28, 2025
Amended Complaint Filed: February
21, 2025

1 PROPOUNDING PARTY: PLAINTIFF ARJUN VASAN
2 RESPONDING PARTY: DEFENDANT CHECKMATE.COM, INC.
3 SET NO.: TWO (2)

4 Defendant Checkmate.com, Inc. (“Defendant” or “Checkmate”) hereby
5 responds to Plaintiff Arjun Vasan (“Plaintiff” or “Vasan”)’s Second Set of Requests
6 for Admission (the “Requests”), as follows:

7 **PRELIMINARY STATEMENT**

8 Checkmate’s investigation of the facts relating to this case is still ongoing. As
9 such, Checkmate has not completed its investigation, has not completed discovery,
10 and has not completed preparation for trial. All of the answers contained herein are
11 based upon the information presently available, and specifically known, to
12 Checkmate. It is anticipated that further discovery and further independent
13 investigation will supply additional facts which may clarify and add meaning to facts
14 presently known, as well as establish new factual matters, all of which may lead to
15 substantial addition to, changes in, and variations from the responses set forth herein.
16 The following responses are given without prejudice to Checkmate’s right to produce
17 evidence of any subsequently discovered fact or facts that Checkmate may later recall.

18 The responses contained herein are made in a good faith effort to supply as
19 much factual information as is presently known, but should in no way be to the
20 prejudice of these parties in relationship to further discovery, research, or analysis.
21 Checkmate reserves the right to alter, supplement, amend, or otherwise modify these
22 responses in any way and at any time, including at or during trial, in light of facts
23 revealed to them through discovery, further investigation, or further legal analysis.
24 Checkmate also reserves the right to amend or supplement these responses with any
25 information that has been inadvertently or unintentionally omitted and/or to introduce
26 such information into evidence at the time of hearing or trial.

27 Checkmate makes these responses to the Requests subject to, and without
28 waiving in any way any objections as to competence, relevance, materiality, propriety,

1 and admissibility, and any and all other objections and grounds which would require
2 the exclusion of any statement herein if the Requests were asked of, or any statements
3 contained were made by, a witness present and testifying in Court, all of which
4 objections and grounds are reserved and may be interposed at time of trial.

5 **GENERAL OBJECTIONS**

6 1. To the extent the Requests call for confidential communications between
7 Checkmate and any of its/his/her attorneys, or information that is otherwise covered
8 by the attorney-client privilege, the work-product doctrine, or any other right or
9 privilege recognized by California or federal law, Checkmate generally objects to the
10 Requests, and each request contained therein.

11 2. Checkmate objects to the Requests, and each request contained therein,
12 to the extent that they seek information protected by the California or United States
13 constitutions, California or federal statutes or case law that establish a right of privacy
14 and forbid the discovery and dissemination of confidential, sensitive and financial
15 information. Checkmate will not reveal such information where doing so would
16 violate the privacy rights of Checkmate or of third parties.

17 3. Checkmate objects to the Requests, and each request contained therein,
18 to the extent that they seek information that is not relevant and/or material to the
19 subject matter of this litigation or are not reasonably calculated to lead to the
20 discovery of admissible evidence.

21 4. Checkmate objects to the Requests, and each request contained therein,
22 insofar as they are repetitive, redundant or overlapping.

23 5. Checkmate objects to the Requests, and each request contained therein,
24 to the extent that they are unduly burdensome, oppressive, annoying or harassing.

25 6. Checkmate objects to the Requests, and each request contained therein,
26 to the extent that they are vague and ambiguous, compound, confusing, unintelligible,
27 unclear and amenable to different meanings, understandings or interpretations.
28 Checkmate is responding to each Request as it interprets and understands that Request

1 with respect to the issues framed in connection with this litigation. If Checkmate
2 asserts an interpretation of any part of a Request that differs from the understanding
3 of Checkmate, Checkmate reserves the right to supplement, amend, or modify their
4 responses or objections.

5 7. Checkmate objects to the Requests, and to each request contained
6 therein, to the extent they are unlimited in time or seek information beyond the time-
7 frame relevant to this litigation on the grounds that they are overbroad and unduly
8 burdensome and seek information that is irrelevant to the subject matter of this
9 litigation.

10 8. Checkmate objects to the Requests, and each request contained therein,
11 to the extent they seek to impose duties or obligations different from, additional to, or
12 otherwise beyond those required by the Federal Rules of Civil Procedure.

13 9. Checkmate objects to the Requests, and each request therein, to the
14 extent they seek information that is equally available to or within Plaintiff's
15 possession, custody or control on the grounds that such Requests are unduly
16 burdensome and oppressive.

17 10. Checkmate objects to the definition of "You" / "Defendant" in that it is
18 vague, ambiguous, overbroad, and reflects an attempt to circumvent Federal Rule of
19 Civil Procedure 45. It is also objectionable to the extent it intrudes upon the
20 attorney/client privilege, work product, and/or other applicable privileges.

21 11. Checkmate objects to the definition of "Separation Meeting" in that it is
22 vague, ambiguous, overbroad, and unduly burdensome.

23 12. Checkmate objects to the definition of "Announcement Meeting" in that
24 it is vague, ambiguous, overbroad, and unduly burdensome.

25 13. Checkmate objects to the definition of "Zoom Transcript" in that it is
26 vague, ambiguous, and overbroad, and unduly burdensome.

27 14. Checkmate objects to the definition of "Fathom Recording" in that it is
28 vague, ambiguous, and overbroad, and unduly burdensome.

1 15. Checkmate objects to the definition of “Post-Call Segment” in that it is
2 vague, ambiguous, and overbroad, and unduly burdensome.

3 16. The foregoing objections are incorporated by reference into each of the
4 specific responses made herein. Notwithstanding the specific responses to any of the
5 Requests, Checkmate does not waive any of the general or specific objections made
6 herein.

7 17. Subject to and without waiving the foregoing General Objections,
8 Checkmate responds to Vasan’s Second Set of Requests for Admissions as follows:

9 **RESPONSES TO REQUESTS FOR ADMISSION**

10 **REQUEST FOR ADMISSION NO. 1:**

11 Admit that prior to the **Separation Meeting**, Plaintiff had offered to return part-
12 time and had sent Checkmate medical certification clearing him to work on a limited
13 schedule.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

15 Responding Party hereby incorporates the General Objections as though fully
16 set forth herein. Responding Party objects to this Request on the grounds that the term
17 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
18 unduly burdensome. Responding Party further objects that the terms “clearing him”
19 and “limited schedule” are vague, ambiguous, and overbroad. Responding Party
20 further objects that the Request is compound, containing multiple distinct inquiries
21 within a single request, which is improper under the applicable Rules.

22 **REQUEST FOR ADMISSION NO. 2:**

23 Admit that **Vishal Agarwal** scheduled the **Separation Meeting**, and by email,
24 purported that the purpose of the meeting was to discuss Plaintiff’s offer to return to
25 work.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

27 Responding Party hereby incorporates the General Objections as though fully
28 set forth herein. Responding Party objects to this Request on the grounds that the term

1 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
2 unduly burdensome. Responding Party further objects that the terms “purported that
3 the purpose” are vague, ambiguous, and overbroad. Responding Party further objects
4 that the Request is compound, containing multiple distinct inquiries within a single
5 request, which is improper under the applicable Rules.

6 **REQUEST FOR ADMISSION NO. 3:**

7 Admit that the **Separation Meeting** started at approximately **8:00 a.m. Pacific**
8 **Time.**

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the term
12 “Separation Meeting,” as defined by Plaintiff is vague, ambiguous, overbroad, and
13 unduly burdensome.

14 Without waiving the foregoing objections, Responding Party responds as
15 follows: Checkmate admits that Mike Bell, Vishal Agarwal, Amy Brown, and
16 Plaintiff attended a recorded meeting via Zoom on November 14, 2024, beginning at
17 8:00 a.m. Pacific Time, and otherwise denies the remainder of the Request.

18 **REQUEST FOR ADMISSION NO. 4:**

19 Admit that Checkmate personnel, including **Vishal Agarwal, Michael Bell,**
20 **and Amy Brown,** attended the **Separation Meeting.**

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

22 Responding Party hereby incorporates the General Objections as though fully
23 set forth herein. Responding Party objects to this Request on the grounds that the term
24 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
25 unduly burdensome. Responding Party further objects that the term “Checkmate
26 personnel” are vague, ambiguous, and overbroad.

27 Without waiving the foregoing objections, Responding Party responds as
28 follows: Checkmate admits that Mike Bell, Vishal Agarwal, Amy Brown, and

1 Plaintiff attended a recorded meeting via Zoom on November 14, 2024, beginning at
2 8:00 a.m. Pacific Time, and otherwise denies the remainder of the Request.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that the **Separation Meeting was recorded.**

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

6 Responding Party hereby incorporates the General Objections as though fully
7 set forth herein. Responding Party objects to this Request on the grounds that the term
8 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
9 unduly burdensome.

10 Without waiving the foregoing objections, Responding Party responds as
11 follows: Checkmate admits that Mike Bell, Vishal Agarwal, Amy Brown, and
12 Plaintiff attended a recorded meeting via Zoom on November 14, 2024, beginning at
13 8:00 a.m. Pacific Time, and otherwise denies the remainder of the Request.

14 **REQUEST FOR ADMISSION NO. 6:**

15 Admit that the recording referenced in ¶ 3 continued after Plaintiff
16 disconnected.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

18 Responding Party hereby incorporates the General Objections as though fully
19 set forth herein. Responding Party objects to this Request on the grounds that the
20 terms “the recording” and “referenced in ¶ 3” are so vague, ambiguous, overbroad,
21 and unduly burdensome as to render the Request unintelligible. Responding Party
22 further objects to this Request in that the term “referenced” is vague, ambiguous, and
23 overbroad. To determine whether a document or thing “references” the facts recited
24 in the Request requires interpretation, and it is unclear from the Request in what
25 manner the information may “reference” such facts. Responding Party further objects
26 that the Request is not self-contained as it incorporates another pleading by reference,
27 which is improper under the applicable Rules.

28 Without waiving the foregoing objections, Responding Party responds as

1 follows: Given that the Request is unintelligible, Responding Party lacks the ability
2 to admit or deny it, and on that basis denies the Request.

3 **REQUEST FOR ADMISSION NO. 7:**

4 Admit that the **Separation Meeting** recording was processed by
5 **Fathom.video**, which generated a transcript and/or summary.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the term
9 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
10 unduly burdensome. Responding Party further objects that the terms “was processed
11 by” are vague, ambiguous, and overbroad. Responding Party further objects that the
12 Request is compound, containing multiple distinct inquiries within a single request,
13 which is improper under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 8:**

15 Admit that the **Fathom.video link**, video and summary remain live at the web
16 address: <https://fathom.video/share/j-ZStSqCq9Z7mRriEnHs6R7dxy7Aqixp?tab=summary>.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party hereby incorporates the General Objections as though fully
19 set forth herein. Responding Party objects to this Request on the grounds that the
20 terms “remain live” are vague, ambiguous, and overbroad. Responding Party further
21 objects that the Request is compound, containing multiple distinct inquiries within a
22 single request, which is improper under the applicable Rules.

23 **REQUEST FOR ADMISSION NO. 9:**

24 Admit that, prior to the **Separation Meeting**, Checkmate was informed by
25 email that **Plaintiff was in a medical facility with limited access to devices**.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

27 Responding Party hereby incorporates the General Objections as though fully
28 set forth herein. Responding Party objects to this Request on the grounds that the term

1 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
2 unduly burdensome. Responding Party further objects that the terms “medical
3 facility,” “limited access,” and “devices” are vague, ambiguous, and overbroad.
4 Responding Party further objects to this Request on the grounds that the terms “prior
5 to” are vague, ambiguous, and overbroad as to the relevant time period.

6 Without waiving the foregoing objections, Responding Party responds as
7 follows: Without waiving the foregoing objections, Responding Party responds as
8 follows: Checkmate admits that on or around October 23, 2024, Plaintiff requested
9 medical leave and was approved by Checkmate to take personal medical leave that
10 would consist of two weeks of paid time off and otherwise denies the remainder of
11 the Request.

12 **REQUEST FOR ADMISSION NO. 10:**

13 Admit that Plaintiff started the call by describing his improving health,
14 eagerness to return to work and ongoing assistance to the Voice team while he was
15 recovering.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

17 Responding Party hereby incorporates the General Objections as though fully
18 set forth herein. Responding Party objects to this Request on the grounds that the
19 terms “started the call,” “improving health,” “eagerness to return to work,” “ongoing
20 assistance,” “Voice team,” and “recovering” are vague, ambiguous, and overbroad.
21 Responding Party further objects that the Request seeks information that is neither
22 relevant to the subject matter of the action nor reasonably calculated to lead to the
23 discovery of admissible evidence. Responding Party further objects that the Request
24 is compound, containing multiple distinct inquiries within a single request, which is
25 improper under the applicable Rules.

26 **REQUEST FOR ADMISSION NO. 11:**

27 Admit that during the **Separation Meeting, Mr. Agarwal stated to Plaintiff**
28 words to the effect: **“you are being terminated with immediate effect, right now,**

1 **right this second.”**

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

3 Responding Party hereby incorporates the General Objections as though fully
4 set forth herein. Responding Party objects to this Request on the grounds that the term
5 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
6 unduly burdensome. Responding Party further objects in that the terms “words to the
7 effect” are vague, ambiguous, and overbroad. Responding Party further objects that
8 the Request calls for a legal conclusion rather than a factual response.

9 Without waiving the foregoing objections, Responding Party responds as
10 follows: Deny.

11 **REQUEST FOR ADMISSION NO. 12:**

12 Admit that **Mr. Agarwal repeated words to that effect at least two times**
13 **during the Separation Meeting.**

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

15 Responding Party hereby incorporates the General Objections as though fully
16 set forth herein. Responding Party objects to this Request on the grounds that the term
17 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
18 unduly burdensome. Responding Party further objects in that the terms “repeated”
19 and “words to that effect” are so vague, ambiguous, and overbroad as to render the
20 Request unintelligible.

21 Without waiving the foregoing objections, Responding Party responds as
22 follows: Given that the Request is unintelligible, Responding Party lacks the ability
23 to admit or deny it, and on that basis denies the Request.

24 **REQUEST FOR ADMISSION NO. 13:**

25 Admit that, during the November 14 Meeting, **Mr. Agarwal referenced**
26 **turning the matter over to a lawyer** if a settlement could not be reached, or words
27 to that effect.

28 **///**

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

2 Responding Party hereby incorporates the General Objections as though fully
3 set forth herein. Responding Party objects to this Request on the grounds that the
4 terms “November 14 Meeting,” “turning the matter over,” and “words to that effect”
5 are vague, ambiguous, and overbroad. Responding Party further objects to this
6 Request in that the term “referenced” is vague, ambiguous, and overbroad. To
7 determine whether a document or thing “references” the facts recited in the Request
8 requires interpretation, and it is unclear from the Request in what manner the
9 information may “reference” such facts. Responding Party further objects that the
10 Request is compound, containing multiple distinct inquiries within a single request,
11 which is improper under the applicable Rules.

12 **REQUEST FOR ADMISSION NO. 14:**

13 Admit that Plaintiff attempted to argue that he had only sent the **Competitor**
14 **Emails** because his bonus had not been paid, and felt he was being “screwed”, or
15 words to that effect.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

17 Responding Party hereby incorporates the General Objections as though fully
18 set forth herein. Responding Party objects to this Request on the grounds that the term
19 “Competitor Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
20 unduly burdensome. Responding Party further objects that the terms “attempted to
21 argue,” “being ‘screwed’,” and “words to that effect” are vague, ambiguous, and
22 overbroad. Responding Party further objects that the Request is compound, containing
23 multiple distinct inquiries within a single request, which is improper under the
24 applicable Rules.

25 **REQUEST FOR ADMISSION NO. 15:**

26 Admit that **prior to Mr. Agarwal stating that Plaintiff was being**
27 **terminated**, Plaintiff had been discussing his return to work, and ongoing assistance
28 to the Voice team.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

2 Responding Party hereby incorporates the General Objections as though fully
3 set forth herein. Responding Party objects to this Request on the grounds that the
4 terms “being terminated,” “return to work,” “ongoing assistance” and “Voice team”
5 are vague, ambiguous, and overbroad. Responding Party further objects to this
6 Request on the grounds that the terms “prior to” are vague, ambiguous, and overbroad
7 as to the relevant time period. Responding Party further objects that the Request calls
8 for a legal conclusion rather than a factual response. Responding Party further objects
9 that the Request is compound, containing multiple distinct inquiries within a single
10 request, which is improper under the applicable Rules.

11 **REQUEST FOR ADMISSION NO. 16:**

12 Admit that Mr. Agarwal **indicated the termination decision was final.**

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

14 Responding Party hereby incorporates the General Objections as though fully
15 set forth herein. Responding Party objects to this Request on the grounds that the
16 terms “termination decision” and “final” are vague, ambiguous, and overbroad.
17 Responding Party further objects that the Request calls for a legal conclusion rather
18 than a factual response.

19 Without waiving the foregoing objections, Responding Party responds as
20 follows: Deny.

21 **REQUEST FOR ADMISSION NO. 17:**

22 Admit that, during the **Separation Meeting, Mr. Bell referenced involving a**
23 **lawyer**, or words to that effect.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

25 Responding Party hereby incorporates the General Objections as though fully
26 set forth herein. Responding Party objects to this Request on the grounds that the term
27 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
28 unduly burdensome. Responding Party further objects that the terms “involving a

1 lawyer” and “words to that effect” are vague, ambiguous, and overbroad. Responding
2 Party further objects to this Request in that the term “referenced” is vague, ambiguous,
3 and overbroad. To determine whether a document or thing “references” the facts
4 recited in the Request requires interpretation, and it is unclear from the Request in
5 what manner the information may “reference” such facts. Responding Party further
6 objects that the Request is compound, containing multiple distinct inquiries within a
7 single request, which is improper under the applicable Rules.

8 **REQUEST FOR ADMISSION NO. 18:**

9 Admit that, during the Separation Meeting, **Mr. Agarwal referenced the**
10 **Lunchbox Emails** as the basis for alleging that Plaintiff had violated the non-
11 solicitation clause.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

13 Responding Party hereby incorporates the General Objections as though fully
14 set forth herein. Responding Party objects to this Request on the grounds that the term
15 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
16 unduly burdensome. Responding Party further objects that the terms “Lunchbox
17 Emails” are so vague, ambiguous, and overbroad as to render the Request
18 unintelligible. Responding Party further objects that the terms “as the basis for
19 alleging” and “non-solicitation clause” are vague, ambiguous, and overbroad.
20 Responding Party further objects to this Request in that the term “referenced” is
21 vague, ambiguous, and overbroad. To determine whether a document or thing
22 “references” the facts recited in the Request requires interpretation, and it is unclear
23 from the Request in what manner the information may “reference” such facts.
24 Responding Party further objects that the Request calls for a legal conclusion rather
25 than a factual response. Responding Party further objects that the Request is
26 compound, containing multiple distinct inquiries within a single request, which is
27 improper under the applicable Rules.

28 Without waiving the foregoing objections, Responding Party responds as

1 follows: Given that the Request is unintelligible, Responding Party lacks the ability
2 to admit or deny it, and on that basis denies the Request.

3 **REQUEST FOR ADMISSION NO. 19:**

4 Admit that during the **Separation Meeting**, Mr. Agarwal stated words to the
5 effect that **the only reason** for Plaintiff's termination were the **Competitor Emails**.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the
9 terms "Separation Meeting" and "Competitor Emails," as defined by Plaintiff, are
10 vague, ambiguous, overbroad, and unduly burdensome. Responding Party further
11 objects that the terms "words to the effect" are vague, ambiguous, and overbroad.
12 Responding Party further objects that the Request calls for a legal conclusion rather
13 than a factual response.

14 Without waiving the foregoing objections, Responding Party responds as
15 follows: Deny.

16 **REQUEST FOR ADMISSION NO. 20:**

17 Admit that, **as of the start** of the **Separation Meeting**, the only basis known
18 to Checkmate for alleging solicitation by Plaintiff were the **Competitor Emails**.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

20 Responding Party hereby incorporates the General Objections as though fully
21 set forth herein. Responding Party objects to this Request on the grounds that the
22 terms "Separation Meeting" and "Competitor Emails," as defined by Plaintiff, are
23 vague, ambiguous, overbroad, and unduly burdensome. Responding Party further
24 objects that the terms "as of the start of" and "the only basis known" are vague,
25 ambiguous, and overbroad. Responding Party further objects that the Request calls
26 for a legal conclusion rather than a factual response.

27 Without waiving the foregoing objections, Responding Party responds as
28 follows: Deny.

1 **REQUEST FOR ADMISSION NO. 21:**

2 Admit that, **as of the start** of the **Separation Meeting**, Checkmate had not
3 received any written or oral report from any person asserting that Plaintiff asked them
4 to leave Checkmate.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

6 Responding Party hereby incorporates the General Objections as though fully
7 set forth herein. Responding Party objects to this Request on the grounds that the term
8 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
9 unduly burdensome. Responding Party further objects that the terms “as of the start
10 of,” “any written or oral report,” “any person,” and “asked them to leave” are vague,
11 ambiguous, and overbroad. Responding Party further objects that the Request is
12 compound, containing multiple distinct inquiries within a single request, which is
13 improper under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 22:**

15 Admit that, **as of the start** of the **Separation Meeting**, Checkmate had not
16 conducted any investigation into whether Plaintiff asked any employee to leave
17 Checkmate.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

19 Responding Party hereby incorporates the General Objections as though fully
20 set forth herein. Responding Party objects to this Request on the grounds that the term
21 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
22 unduly burdensome. Responding Party further objects that the terms “as of the start
23 of,” “any investigation,” “any employee,” and “to leave Checkmate” are vague,
24 ambiguous, and overbroad.

25 Without waiving the foregoing objections, Responding Party responds as
26 follows: Deny.

27 **REQUEST FOR ADMISSION NO. 23:**

28 Admit that, during the **Post-Call Segment**, **Mr. Agarwal** stated words to the

1 effect: “*he’s on medical leave; in [t]his condition; we fired him for something that’s*
2 *not true.*”

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

4 Responding Party hereby incorporates the General Objections as though fully
5 set forth herein. Responding Party objects to this Request on the grounds that the term
6 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
7 unduly burdensome. Responding Party further objects that the terms “words to the
8 effect” are vague, ambiguous, and overbroad.

9 Without waiving the foregoing objections, Responding Party responds as
10 follows: Deny.

11 **REQUEST FOR ADMISSION NO. 24:**

12 Admit that, during the **Post-Call Segment**, participants discussed off-boarding
13 steps for Plaintiff.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

15 Responding Party hereby incorporates the General Objections as though fully
16 set forth herein. Responding Party objects to this Request on the grounds that the term
17 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
18 unduly burdensome. Responding Party further objects that the terms “participants”
19 and “off-boarding steps” are vague, ambiguous, and overbroad.

20 Without waiving the foregoing objections, Responding Party responds as
21 follows: Deny.

22 **REQUEST FOR ADMISSION NO. 25:**

23 Admit that Mr. Bell stated during the **Post-Call Segment**, that he had been
24 preparing other team members for Plaintiff no longer working at Checkmate.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

26 Responding Party hereby incorporates the General Objections as though fully
27 set forth herein. Responding Party objects to this Request on the grounds that the term
28 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and

1 unduly burdensome. Responding Party further objects that the terms “had been
2 preparing,” “other team members,” and “no longer working” are vague, ambiguous,
3 and overbroad.

4 Without waiving the foregoing objections, Responding Party responds as
5 follows: Deny.

6 **REQUEST FOR ADMISSION NO. 26:**

7 Admit that Mr. Bell had not seen the **Competitor Emails** himself prior to the
8 meeting.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the term
12 “Competitor Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
13 unduly burdensome. Responding Party further objects that the terms “prior to” are
14 vague, ambiguous, and overbroad as to the relevant time period.

15 Without waiving the foregoing objections, Responding Party responds as
16 follows: Checkmate admits that while Vasan was on leave, Mr. Agarwal learned
17 through an industry contact that Vasan had contacted a competitor of Checkmate to
18 discuss the possibility of joining the competitor’s company, bringing two engineers
19 from Checkmate with him, and otherwise denies the remainder of the Request.

20 **REQUEST FOR ADMISSION NO. 27:**

21 Admit that, during the **Post-Call Segment**, participants discussed scheduling a
22 9:00 a.m. Pacific meeting that same morning to inform the team (“Announcement
23 Meeting”).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

25 Responding Party hereby incorporates the General Objections as though fully
26 set forth herein. Responding Party objects to this Request on the grounds that the term
27 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
28 unduly burdensome. Responding Party further objects that the terms “participants,”

1 “discussed scheduling,” “that same morning,” and “inform the team” are so vague,
2 ambiguous, and overbroad as to render the Request unintelligible.

3 Without waiving the foregoing objections, Responding Party responds as
4 follows: Given that the Request is unintelligible, Responding Party lacks the ability
5 to admit or deny it, and on that basis denies the Request.

6 **REQUEST FOR ADMISSION NO. 28:**

7 Admit that the **Announcement Meeting** was indeed scheduled for 9:00 a.m.
8 Pacific on November 14, 2024.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the term
12 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
13 and unduly burdensome. Responding Party further objects that the terms “indeed
14 scheduled” are vague, ambiguous, and overbroad.

15 Without waiving the foregoing objections, Responding Party responds as
16 follows: Deny.

17 **REQUEST FOR ADMISSION NO. 29:**

18 Admit that the **Announcement Meeting** indeed occurred at the scheduled time.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

20 Responding Party hereby incorporates the General Objections as though fully
21 set forth herein. Responding Party objects to this Request on the grounds that the term
22 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
23 and unduly burdensome. Responding Party further objects that the terms “indeed
24 occurred” and “scheduled time” are vague, ambiguous, and overbroad.

25 Without waiving the foregoing objections, Responding Party responds as
26 follows: Deny.

27 **REQUEST FOR ADMISSION NO. 30:**

28 Admit that, at the **Announcement Meeting**, Checkmate personnel informed

1 Voice team members that Plaintiff was terminated.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

3 Responding Party hereby incorporates the General Objections as though fully
4 set forth herein. Responding Party objects to this Request on the grounds that the term
5 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
6 and unduly burdensome. Responding Party further objects that the terms “Checkmate
7 personnel” and “Voice team members” are vague, ambiguous, and overbroad.
8 Responding Party further objects that the Request calls for a legal conclusion rather
9 than a factual response.

10 Without waiving the foregoing objections, Responding Party responds as
11 follows: Deny.

12 **REQUEST FOR ADMISSION NO. 31:**

13 Admit that the reason given at the **Announcement Meeting** for Plaintiff’s
14 termination was solicitation of employees.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

16 Responding Party hereby incorporates the General Objections as though fully
17 set forth herein. Responding Party objects to this Request on the grounds that the term
18 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
19 and unduly burdensome. Responding Party further objects that the terms “the reason
20 given” are vague, ambiguous, and overbroad. Responding Party further objects that
21 the Request calls for a legal conclusion rather than a factual response.

22 Without waiving the foregoing objections, Responding Party responds as
23 follows: Deny.

24 **REQUEST FOR ADMISSION NO. 32:**

25 Admit that attendees at the **Announcement Meeting** included **Robert Nessler**
26 and at least two or more of the following: **Christopher Lam, Isamu Aoki, Paul**
27 **Garcia, and Pranav Sood**, as well as **one or both of Mr. Agarwal and Mr. Bell.**

28 ///

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

2 Responding Party hereby incorporates the General Objections as though fully
3 set forth herein. Responding Party objects to this Request on the grounds that the term
4 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
5 and unduly burdensome. Responding Party further objects that the terms “attendees,”
6 “at least two or more of the following,” and “as well as one or both” are vague,
7 ambiguous, and overbroad. Responding Party further objects that the Request is
8 compound, containing multiple distinct inquiries within a single request, which is
9 improper under the applicable Rules.

10 **REQUEST FOR ADMISSION NO. 33:**

11 Admit that one or more team members present at the **Announcement Meeting**
12 were questioned about the solicitation allegations, but only after Plaintiff’s
13 termination.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

15 Responding Party hereby incorporates the General Objections as though fully
16 set forth herein. Responding Party objects to this Request on the grounds that the term
17 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
18 and unduly burdensome. Responding Party further objects that the terms “one or more
19 team members” and “the solicitation allegations” are vague, ambiguous, and
20 overbroad. Responding Party further objects that the Request calls for a legal
21 conclusion rather than a factual response. Responding Party further objects to this
22 Request on the grounds that the terms “only after” are vague, ambiguous, and
23 overbroad as to the relevant time period. Responding Party further objects that the
24 Request is compound, containing multiple distinct inquiries within a single request,
25 which is improper under the applicable Rules.

26 **REQUEST FOR ADMISSION NO. 34:**

27 Admit that **no Voice team member reported any such solicitation** of them
28 by Plaintiff.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

2 Responding Party hereby incorporates the General Objections as though fully
3 set forth herein. Responding Party objects to this Request on the grounds that the
4 terms “Voice team member” and “any such solicitation” are vague, ambiguous, and
5 overbroad. Responding Party further objects that the Request calls for a legal
6 conclusion rather than a factual response.

7 Without waiving the foregoing objections, Responding Party responds as
8 follows: Deny.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the Zoom and Fathom.video accounts used for the **Separation**
11 **Meeting** were managed or controlled by Checkmate or its agents.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

13 Responding Party hereby incorporates the General Objections as though fully
14 set forth herein. Responding Party objects to this Request on the grounds that the
15 term “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
16 and unduly burdensome. Responding Party further objects that the terms “accounts
17 used,” “managed or controlled,” and “its agents” are vague, ambiguous, and
18 overbroad. Responding Party further objects that the Request calls for a legal
19 conclusion rather than a factual response. Responding Party further objects that the
20 Request is compound, containing multiple distinct inquiries within a single request,
21 which is improper under the applicable Rules.

22 **REQUEST FOR ADMISSION NO. 36:**

23 Admit that the **Separation Meeting** is the same Zoom meeting described in the
24 Agarwal Declaration at ¶ 26 of ECF No. 18-4.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

26 Responding Party hereby incorporates the General Objections as though fully
27 set forth herein. Responding Party objects to this Request on the grounds that the term
28 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and

1 unduly burdensome. Responding Party further objects that the terms “the same Zoom
2 meeting” are vague, ambiguous, and overbroad. Responding Party further objects that
3 the Request is not self-contained as it incorporates another pleading by reference,
4 which is improper under the applicable Rules. Responding Party further objects that
5 the Request is compound, containing multiple distinct inquiries within a single
6 request, which is improper under the applicable Rules.

7 **REQUEST FOR ADMISSION NO. 37:**

8 Admit that the **Announcement Meeting** is the 9:00AM meeting described by
9 Robert Nessler in the **Nessler Declaration (ECF No. 81-2 at 7, ¶¶ 7-8)**.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

11 Responding Party hereby incorporates the General Objections as though fully
12 set forth herein. Responding Party objects to this Request on the grounds that the term
13 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,
14 and unduly burdensome. Responding Party further objects that the Request is not self-
15 contained as it incorporates another pleading by reference, which is improper under
16 the applicable Rules. Responding Party further objects that the Request is compound,
17 containing multiple distinct inquiries within a single request, which is improper under
18 the applicable Rules.

19 **REQUEST FOR ADMISSION NO. 38:**

20 Admit that the **Competitor Emails** are the same as those described in the
21 **Agarwal Declaration at ¶ 25** and exhibited at **p. 78-80 of ECF No. 18-4**.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

23 Responding Party hereby incorporates the General Objections as though fully
24 set forth herein. Responding Party objects to this Request on the grounds that the term
25 “Competitor Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
26 unduly burdensome. Responding Party further objects that the terms “are the same as
27 those described” are vague, ambiguous, and overbroad. Responding Party further
28 objects that the Request is not self-contained as it incorporates another pleading by

1 reference, which is improper under the applicable Rules. Responding Party further
2 objects that the Request is compound, containing multiple distinct inquiries within a
3 single request, which is improper under the applicable Rules.

4 **REQUEST FOR ADMISSION NO. 39:**

5 Admit that Checkmate **possesses no other such emails or communications.**

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the
9 terms “no other such emails or communications” are so vague, ambiguous, and
10 overbroad as to render the Request unintelligible. Responding Party further objects
11 that the Request is compound, containing multiple distinct inquiries within a single
12 request, which is improper under the applicable Rules.

13 **REQUEST FOR ADMISSION NO. 40:**

14 Admit that, during the **Separation Meeting, Plaintiff did not state that he**
15 **was resigning.**

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

17 Responding Party hereby incorporates the General Objections as though fully
18 set forth herein. Responding Party objects to this Request on the grounds that the term
19 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
20 unduly burdensome. Responding Party further objects that the Request calls for a legal
21 conclusion rather than a factual response.

22 ///

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1 Without waiving the foregoing objections, Responding Party responds as
2 follows: Checkmate admits that on November 14, 2024, at 9:57 a.m. PST, Vasan
3 resigned via email and otherwise denies the remainder of the Request.

4
5 Date: September 16, 2025

K&L GATES LLP

6
7 

8 Ryan Q. Keech (SBN 280306)
9 Stacey Chiu (SBN 321345)
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17 *Attorneys for Defendant and Counter-*
18 *Claimant CHECKMATE.COM INC.*
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PROOF OF SERVICE

Case No. 2:25-CV-00765-MEMF-JPR

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is K&L GATES LLP, 10100 Santa Monica Boulevard, Eighth Floor, Los Angeles, California 90067.

On **September 16, 2025**, I served the document(s) described as:

**CHECKMATE.COM, INC.'S RESPONSES TO PLAINTIFF ARJUN VASAN'S SECOND SET
OF REQUESTS FOR ADMISSIONS**

on the person or person(s) below, as follows:

Arjun Vasan
12615 193rd Street
Cerritos, CA 90703
Email: arjun.vasan@gmail.com
Telephone: 562-900-6541


Plaintiff Pro Se

The documents were served by the following means:

- ☐ **BY U.S. MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office of the addressee(s) as indicated above. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY ELECTRONIC SERVICE:** by transmitting a true copy of the foregoing document(s) to the email-addresses set forth as stated above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **September 16, 2025**, at Los Angeles, California.



Dyana Estrada